



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

August 15, 2008

Mr. Daryl Pessler  
ConocoPhillips Company  
P.O.Box 25376  
Santa Ana, CA 92799-5376

**AMENDMENT TO GENERAL WASTE DISCHARGE REQUIREMENTS COVERAGE FOR  
PROPOSED OZONE SPARGING TO GROUNDWATER (ORDER NO. R4-2007-0019)  
(SERIES NO. 077)  
76 STATION No. 5523, 1121 SOUTH VICTORIA AVENUE, VENTURA, CALIFORNIA  
(FILE #C95026, CI-8912)**

Dear Mr. Pessler:

We have received a letter requesting amendment to the General Waste Discharge Requirement (WDR) for ozone injection, dated April 10, 2008, submitted by Stantec, on behalf of ConocoPhillips Company (ConocoPhillips).

ConocoPhillips modified the original remedial action plan (RAP) by adding one proposed additional groundwater monitoring well and eight ozone-sparing points. The revised RAP was approved on June 4, 2008 by the lead agency, the Environmental Health Division of the County of Ventura.

On March 1, 2007, the Regional Board adopted Order No. R4-2007-0019 "General Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon Fuel, Volatile Organic Compound and/or Hexavalent Chromium Impacted Site". You are hereby notified that the original WDR R4-2005-0030 you received is superseded by WDR R4-2007-0019.

Enclosed are your Waste Discharge Requirements, consisting of Regional Board Order No. R4-2007-0019 and Revised Monitoring and Reporting Program No. CI-8912.

The WDRs issued shall not be rescinded until Regional Board staff determine the WRDs are no longer needed for the site cleanup.

The Monitoring and Reporting Program requires you to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2007-0019. All monitoring reports shall be sent to the Regional Board, ATTN: Information Technology Unit.

When submitting monitoring or technical reports to the Regional Board, please reference Compliance File No. CI-8912 to assure that the reports are directed to the appropriate staff. Do not combine other reports with your monitoring reports complying with Order No. R4-2007-0019. Submit each type of report as a separate document.

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Mr. Daryl Pessler  
ConocoPhillips Company


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August 15, 2008

We are sending a copy of Order No. R4-2007-0019 only to the applicant. A copy of the Order and Standard Provisions can be downloaded from the internet at [http://www.waterboards.ca.gov/losangeles/board\\_decisions/adopted\\_orders/general\\_orders/r4-2007-0019/r4-2007-0019.pdf](http://www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2007-0019/r4-2007-0019.pdf).

**If you have any questions concerning this matter, please call Dr. Rebecca Chou at (213) 620-6156 or Mr. Jay Huang at (213) 576-6711.**

Sincerely,

  
\_\_\_\_\_  
Tracy J. Egoscue  
Executive Officer

Enclosures

1. Board Order No. R4-2007-0019
2. Monitoring and Reporting Program No. CI-9434

cc: Yvonne Shanks, State Water Resources Control Board, Underground  
Storage Tank Cleanup Fund(w/o Board Order No. R4-2005-0030)  
David Salter, Ventura County Environmental Health Division  
Leslie Bond, Stantec  
Rebecca Chou, Waste Discharge Unit

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STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
MONITORING AND REPORTING PROGRAM NO. CI-8912  
for  
CONOCOPHILLIPS COMPANY  
1121 SOUTH VICTORIA AVENUE, VENTURA  
(OZONE INJECTION FOR GROUNDWATER CLEANUP)  
(ORDER NO. R4-2007-0019, SERIES NO. 077)

I. REPORTING REQUIREMENTS

- A. ConocoPhillips Company (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2007-0019. The first monitoring report under this program shall be received two months after ozone injection at the Regional Board. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

Monitoring reports must be addressed to the regional Board, Attention: Information Technology Unit.

- B. If there is no discharge or injection during any reporting period, the report shall so state.
- C. By January 30 of each year, beginning January 30, 2008, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall explain the compliance record and the corrective actions taken, or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements (WDRs).
- D. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.
- E. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Regional Board Executive Officer (Executive Officer). The Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures upon request by the Regional Board.

Revised August 15, 2008

- F. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff.
- G. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- H. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with WDRs. This section shall be located at the front of the report and shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limitations.
- I. The Discharger shall maintain all sampling and analytical results: date, exact place, and time of sampling; dates analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Regional Board.
- J. If the Discharger performs analyses on any groundwater samples more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report.
- K. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.

## II. OZONE INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the ozone injection.
2. Written and tabular summary defining the quantity of ozone injected per month to the groundwater and a summary describing the days on which the injection system was in operation.
3. Quarterly visual inspection at each injection point shall be conducted to evaluate the well casing

integrity for a period of three month after each injection. The quarterly report shall include a summary of the visual inspection.

4. To avoid groundwater monitoring network reduction, data bias, and well screen clogging or alteration, no groundwater monitoring wells shall be used as injection points during the proposed ozone injection. Separate injection points/wells must be installed at the site for the injection.

### III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site.

Groundwater samples shall be collected from up-gradient groundwater monitoring well MW-12, source wells MW-8, and MW-9, and down-gradient well MW-11 to monitor the effectiveness of the in-situ groundwater remediation (refer to attached Figure 1). Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L	Grab	• Quarterly <sup>1</sup>
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	• Quarterly <sup>1</sup>
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Quarterly <sup>1</sup>
Ethanol Formaldehyde Acetone	µg/L	Grab	• Quarterly <sup>1</sup>
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Quarterly <sup>1</sup>
Oxidation-reduction potential	millivolts		• Quarterly <sup>1</sup>
Dissolved Oxygen	µg/L	Grab	• Quarterly <sup>1</sup>
Dissolved ferrous iron	µg/L	Grab	• Quarterly <sup>1</sup>

Total Chromium and chromium six <sup>2</sup>	µg/L	Grab	• Quarterly <sup>1</sup>
PH	pH units	Grab	• Quarterly <sup>1</sup>
Temperature	<sup>0</sup> F/ <sup>0</sup> C	Grab	• Quarterly <sup>1</sup>
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Quarterly <sup>1</sup>

<sup>1</sup> One week before injection and Quarterly thereafter

<sup>2</sup> The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth quarterly sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored quarterly thereafter.

All groundwater monitoring reports must include, at a minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Quarterly observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

IV. MONITORING FREQUENCIES

Monitoring frequencies may be adjusted to a less frequent basis or parameters dropped by the Executive Officer if the Discharger makes a request and the Executive Officer determines that the request is adequately supported by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

Executed on the \_\_\_\_\_ day of \_\_\_\_\_ at \_\_\_\_\_.

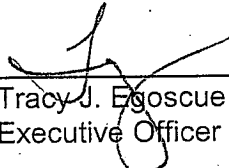
\_\_\_\_\_  
 (Signature)

\_\_\_\_\_  
 (Title)"

VI. PUBLIC DOCUMENTS

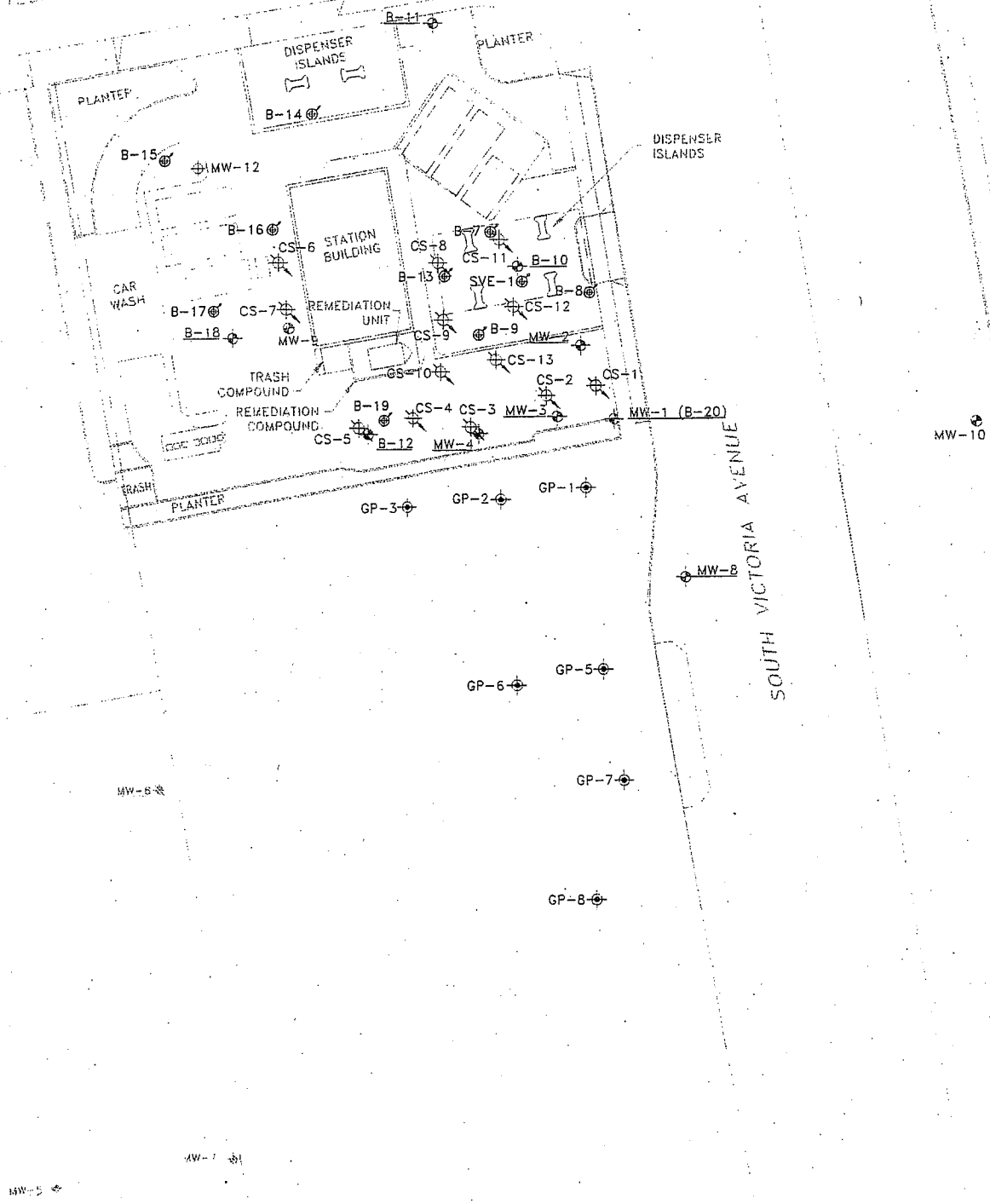
These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by:

  
\_\_\_\_\_  
Tracy J. Egoscue  
Executive Officer

Date: August 15, 2008

TELEPHONE ROAD



**LEGEND**

- MW-12 ⊕ PROPC
- CS-6 ⊕ PROPC
- MW-1 ⊕ GROU
- CS-1 ⊕ C-SPA
- MW4 ⊕ GROU
- B19 ⊕ VAPOF
- GP-1 ⊕ HYDRC
- MW-1 ⊕ ABANC



**SECOR**

290 Conejo Ridge Avenue, Suite 200  
 Thousand Oaks, CA 91361  
 (805) 230-1266/230-1277 (Fax)

FOR: **ConocoPhillips**  
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 1121 South Victoria Avenue  
 Ventura, California

JOB NUMBER: 37CP.01426.41  
 DRAWN BY: